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960028



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX

75 Hawthorne Street  
San Francisco, CA 94105

April 22, 1996

Arthur L. Gaffrey  
Forest Supervisor  
Sequoia National Forest  
900 West Grand Avenue  
Porterville, CA. 93257-2035

Dear Mr. Gaffrey:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the project entitled **Grazing Management for the Sequoia National Forest, Forest Plan Amendment, Sequoia National Forest, CA.** Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The Sequoia National Forest is proposing to amend its Land and Resources Management Plan (LRMP) for the purpose of clarifying and supplementing forest-wide guidelines for range management, and to evaluate incorporation of portions of the 1990 Mediated Settlement Agreement (MSA). Five grazing management alternatives are evaluated. The major differences among the alternatives are in the methods chosen to accomplish the objectives and the length of time taken to do so. Costs and ease of administration are also important factors.

Alternative 1 is the No Action alternative. Alternative 2 would adopt the grazing management guidelines adopted by the Sierra National Forest which uses streambank disturbances, riparian browse use, and residual vegetative stubble height as primary indicators of range use. Alternative 3 focuses on streambank condition, while Alternative 4, the preferred alternative, would emphasize the site specific application of guidelines and focus on streambank disturbance. Alternative 5 would focus on maximizing beneficial riparian conditions for dependent species through reducing the level of riparian use by livestock. Alternatives 3 and 4 would provide for a "phased in" timeframe to provide an opportunity for permittees to adjust to the new management standards. Monitoring schedules and methods are provided for each alternative.

We commend the Sequoia National Forest for the proactive revision of the LRMP and the intent to update range management guidelines to focus more on ecosystem and riparian health and to incorporate the latest scientific information. While we support this progress, we are gravely concerned with the selection of Alternative 4 which appears to maintain the status quo and does



not appear to address forage utilization levels or other ecological parameters. We firmly believe a multi-faceted strategy, such as Alternative 2, would provide a more effective and ecological means of achieving LRMP objectives. Further, we advocate season long monitoring which would allow a quick response to environmental conditions when necessary.

Although we object to the selection of Alternative 4 as the preferred alternative; we recognize the Sequoia National Forest's efforts to improve overall forest health, treat specific problem areas, and to minimize adverse effects on permittees and agriculturally dependent counties. Further, we recognize that only 10-20% of the Forest's stream reaches are in need of remediation. Thus, we have classified this DEIS as category EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of the EPA Rating System"). We strongly urge you to select a more holistic ecological alternative which would address all ecological parameters and not just streambank disturbance.

We appreciate the opportunity to review this DEIS. Our detailed comments are enclosed. Please send two copies of the Final EIS to this office at the same time it is officially filed with our Washington, D.C. office. If you have questions, please call me at (415) 744-1584, or invite your staff to call Ms. Laura Fujii at (415) 744-1579.

Sincerely,



David J. Farrel, Chief  
Office of Federal Activities

Enclosure: (4 pages)

Filename: Sequogra.dei  
MI002409

cc: USFWS, Sacramento  
CDFG, Sacramento  
SWRCB, Region 5, Fresno Branch Office



## SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION

### Environmental Impact of the Action

#### LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommend for referral to the Council on Environmental Quality (CEQ).

### Adequacy of the Impact Statement

#### Category 1-Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### Category 2-Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."



## COMMENTS

### **Alternatives Analysis**

1. The DEIS clearly states that there is a need for improved management in some areas due to evidence of degraded riparian zones, high levels of streambank disturbance, and increased stream erosion. Instead of focusing only on streambank disturbance as the indicator of range use, we urge the Forest Service to consider an approach which would combine the best elements of the alternatives so that all ecological conditions in the Forest are improved in a more comprehensive manner. For example, we recommend serious consideration of an alternative which includes streambank protection, residual dry matter, stubble height, and browse utilization standards to ensure improved and sustainable ecosystem health for meadows, grasslands, and riparian habitat. Further, as indicated by studies cited in Chapter 3, guidelines such as percent utilization by weight, residual dry matter, and stubble height are proven and effective tools in assuring maintenance of vegetative vigor and diversity (pgs.25-30). We believe combining features of the various alternatives would improve ecological conditions in the Forest in a more timely manner yet still be flexible enough to respond to public and environmental needs.

2. In Section 3.2.1.2 the DEIS discusses the use of riparian woody vegetation as browse. Due to the lack of information on the use, regeneration, form, or age class of riparian woody vegetation on the Sequoia National Forest, and the overlap of grazing impacts with impacts from other forest uses; the Forest Service proposes to study the potential natural vegetation and response of riparian areas to different management practices. Given this lack of information; we question the wisdom of selecting an alternative which allows up to 30% usage of this resource. We recommend the Forest Service take a more cautious approach until further information on existing riparian conditions and the affect of grazing is obtained.

3. The rationale for selecting Alternative 4 as the preferred alternative over the others is not clear. It appears to be driven, in part, by the desire to minimize disruption to permittees and counties, and the potential lack of funding. We note that Alternative 4 would maintain the current level of costs and stocking levels (pg. 54) which, in some areas, appears to be reducing forest ecosystem health. The FEIS should clearly indicate why this option was selected as the preferred alternative over the other Alternatives.

4. The DEIS states that Alternative 2 is based upon the grazing management guidelines adopted by the Sierra National Forest.



However, there is no description of effects, if any, which have been observed in the ecosystems of the Sierra National Forest. We recommend including such information in the FEIS, if available.

5. It is unclear whether or not scientific information cited in Chapter 3 has been fully integrated into the Alternatives. For example, the Meadow Forage Utilization section (pgs. 25-27) describes in detail the advantages of maintaining stubble height at various levels. However, only Alternatives 2 and 5 include this parameter among their guidelines. In addition, it is not clear whether the forage needs of wildlife were fully considered and accounted for in Alternative formulation. The FEIS should reflect a more balanced alternatives evaluation which incorporates information such as stubble height/wildlife forage equally across all of the alternatives rather than using such information selectively as is evidenced in the DEIS.

### **Monitoring**

1. Section 3.2.3 on monitoring indicates that the level of monitoring "will be consistently implemented over the long term, within budget constraints." Given the current fiscal constraints and the overall lack of baseline data for the Sequoia National Forest, we are concerned with the ability of the Forest Service to ensure that the monitoring program will be sufficient to perform the task of long term monitoring. The FEIS should provide a discussion of potential funding sources, monitoring priorities, and fall-back options if sufficient funding for monitoring is not obtained.

2. Several of the alternatives use post season monitoring for the streambank disturbance parameter. We believe post season monitoring may reduce the ability to quickly change grazing patterns in response to adverse environmental conditions (e.g., extensive streambank erosion). We recommend consideration of season long monitoring in order to ensure a quick response to potential, unacceptable environmental impacts.

### **Threatened and Endangered Species**

1. Section 3.3.2, Item 8 provides generic guidance for specific threatened, endangered, proposed and sensitive species. Much of this guidance relies upon surveying and monitoring of species populations. Under Section 7 of the Endangered Species Act (ESA), Federal agencies are mandated to use their programs to further the goals of the Act. Although Section 4.4 discusses potential effects of the proposed action on ESA species, it does not provide much information regarding how the proposed management will help further the goals of ESA. We recommend the FEIS

include a discussion to address this issue.

2. The Shirley Meadows star tulip (Calochortus westonii) (aka Shirley Meadows mariposa lily) and Piute buckwheat (Eriogonum breidlovei var. breidlovei) were removed from ESA Candidate status on February 28, 1996. The FEIS should describe the changes, if any, which will be made by the Forest Service in the management of these species in Sequoia National Forest.

#### General

1. One goal of the DEIS was to evaluate incorporation of portions of the 1990 Mediated Settlement Agreement (MSA). The DEIS includes a list of some of the MSA directions, but does not provide any other information regarding this action. To ensure full understanding of the Forest Service's goals, the FEIS should include complete information on the history, participants, sequence, cause, and results of the MSA.